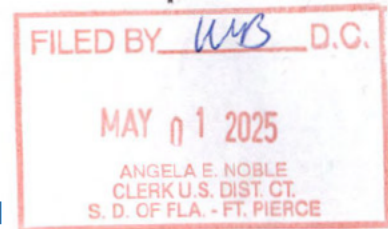


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-CR-20197-WILLIAMS/GOODMAN  
18 U.S.C. § 1546(a)



UNITED STATES OF AMERICA

v.

OLEKSANDR GORBUNENKO,

Defendant.

INDICTMENT

The Grand Jury charges that:

COUNT 1  
**Making a False Statement in an Immigration Document**  
**(18 U.S.C. § 1546(a))**

On or about October 14, 2023, in Miami-Dade County, in the Southern District of Florida,  
the defendant,

**OLEKSANDR GORBUNENKO,**

under penalty of perjury, did knowingly make a false statement with respect to a material fact in an application or other document required by the immigration laws of the United States, that is, a Form I-821, Application for Temporary Protected Status, in that the defendant represented that he had never been cited, charged, or indicted, for breaking or violating any law or ordinance, whether in the United States or any other country, when in truth and in fact, and as the defendant then and there well knew, he had pending charges in Ukraine, alleging that he violated several provisions of the Criminal Code of Ukraine, in violation of Title 18, United States Code, Section 1546(a).

**COUNT 2**  
**Making a False Statement in an Immigration Document**  
**(18 U.S.C. § 1546(a))**

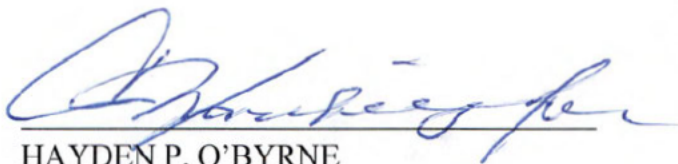
On or about October 14, 2023, in Miami-Dade County, in the Southern District of Florida,  
the defendant,

**OLEKSANDR GORBUNENKO,**

under penalty of perjury, did knowingly make a false statement with respect to a material fact in an application or other document required by the immigration laws of the United States, that is, a Form I-765, Application for Employment Authorization, in that the defendant represented that he had never been cited, charged, or indicted, for breaking or violating any law or ordinance, whether in the United States or any other country, when in truth and in fact, and as the defendant then and there well knew, he had pending charges in Ukraine, alleging that he violated several provisions of the Criminal Code of Ukraine, in violation of Title 18, United States Code, Section 1546(a).

~~A~~ TRUE BILL

\_\_\_\_\_  
~~FOREPERSON~~



HAYDEN P. O'BYRNE  
UNITED STATES ATTORNEY



MICHAEL D. PORTER  
ASSISTANT UNITED STATES ATTORNEY

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

CASE NO.: 25-CR-20197-WILLIAMS/GOODMAN

v.

OLEKSANDR GORBUNENKO,

**CERTIFICATE OF TRIAL ATTORNEY****Court Division** (select one)

- ☒ Miami      ☐ Key West      ☐ FTP  
☐ FTL      ☐ WPB

**Superseding Case Information:**

New Defendant(s) (Yes or No) \_\_\_\_\_

Number of New Defendants \_\_\_\_\_

Total number of new counts \_\_\_\_\_

I do hereby certify that:

1. I have carefully considered the allegations of the Indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No  
List language and/or dialect: \_\_\_\_\_
4. This case will take 5 days for the parties to try.
5. Please check appropriate category and type of offense listed below:  

(Check only one)	(Check only one)
I <input checked="" type="checkbox"/> 0 to 5 days	<input type="checkbox"/> Petty
II <input type="checkbox"/> 6 to 10 days	<input type="checkbox"/> Minor
III <input type="checkbox"/> 11 to 20 days	<input type="checkbox"/> Misdemeanor
IV <input type="checkbox"/> 21 to 60 days	<input checked="" type="checkbox"/> Felony
V <input type="checkbox"/> 61 days and over	
6. Has this case been previously filed in this District Court? (Yes or No) \_\_\_\_\_  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
7. Has a complaint been filed in this matter? (Yes or No) Yes  
If yes, Judge Enjoliqué A. Lett Magistrate Case No. 25-MJ-02789-EAL
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) \_\_\_\_\_  
If yes, Judge \_\_\_\_\_ Case No. \_\_\_\_\_
9. Defendant(s) in federal custody as of 4/18/2025
10. Defendant(s) in state custody as of \_\_\_\_\_
11. Rule 20 from the \_\_\_\_\_ District of \_\_\_\_\_
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? (Yes or No) No
14. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
15. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
16. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

By:   
 MICHAEL D. PORTER  
 Assistant United States Attorney  
 FL Bar No. 0031149

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: OLEKSANDR GORBUNENKO

Case No: 25-CR-20197-WILLIAMS/GOODMAN

Count #: 1

Making a False Statement in an Immigration Document, 18 U.S.C. § 1546(a)

- \* **Max. Term of Imprisonment:** 15 years
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years
- \* **Max. Fine:** \$250,000/\$100 Special Assessment

Count #: 2

Making a False Statement in an Immigration Document, 18 U.S.C. § 1546(a)

- \* **Max. Term of Imprisonment:** 15 years
- \* **Mandatory Min. Term of Imprisonment (if applicable):** N/A
- \* **Max. Supervised Release:** 3 years
- \* **Max. Fine:** \$250,000/\$100 Special Assessment